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IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA

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DEBRA P. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

2 AMARCUS JAMAIN E
HOWARD # 242923

Full name and prison name of
Plaintiff(s)

v.

Sgt. Randolph

CIVIL ACTION NO. 2:17-cv-479-MHT
(To be supplied by Clerk of U.S. District
Court)

DEMAND FOR JURY TRIAL

Name of person(s) who violated your
constitutional rights. (List the names
of all the person.)

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court dealing with the same or similar facts involved in this action? YES ☐ No ☒
- B. Have you begun other lawsuits in state or federal court relating to your imprisonment? YES ☐ NO ☒
- C. If your answer to A or B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s)

N/A

Defendant(s)

N/A

2. Court (if federal court, name the district; if state court, name the county)

N/A

3. Docket number N/A
4. Name of judge to whom case was assigned N/A
5. Disposition (for example: was the case dismissed? Was it appealed? Is it still pending?) N/A
6. Approximate date of filing lawsuit N/A
7. Approximate date of disposition N/A

II. PLACE OF PRESENT CONFINEMENT Bullock Correctional Facility
P.O. Box 5107; Union Springs, AL 36089

PLACE OR INSTITUTION WHERE INCIDENT OCCURRED Bullock Corr.
Fac., P.O. Box 5107; Union Sprgs AL 36089

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGED VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	<u>Sgt. Randolph</u>	<u>P.O. Box 5107;</u> <u>Bullock Corr. Fac. Union Springs, AL 36089</u>
2.		
3.		
4.		
5.		
6.		

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED 6-14-2017

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Sgt. Randolph Violated My Civil
Right By Purposely Assaulting Me By Using
Excessive Force While In Shift Office

* Continued on additional page #2

GROUND # 1, Continued: (Page 2, continued)

me to the shift office... for no good reason... they decided to... in an angry fraction... escort me to the shift office. There - I was approach by Sgt. Randolph, who - then instructed me to shave. As I then attempted to do so, Sgt. Randolph, without notice - struck me violently, to my face, with the palm of his right hand. He then instructed me to put my hand down. As I attempted to explain to said Sgt. Randolph that I'm only trying to do as he asked - and shave. Again, and without notice - he violently slapped me once more. Immediately thereafter, Officer Redd and Officer Brandon and Sgt. Randolph, all, violently - took me to the floor and begin punching me in my face area. While on the floor and begging the officers to stop, I then saw the shift officer's bathroom door come open, and then appeared Officer Giles - who also stood there - but did nothing to assist me, or to simply stop the others from attacking and assaulting me in violent manner. After the aforesaid attack/assault, I was then escorted to the Health Care Unit..., where I received a body chart; Officer Redd received one as well. Sgt. Randolph and Officer Brandon did not receive one... to my knowledge. Since this incident, I am still experiencing slight hearing and visual impairment. And mentally, is experiencing some mental anguish and unwelcomed fear of the officers involved. (The suit is subject to be amended to include other defendants and/or witness(es)).

STATE BRIEFLY THE FACTS WHICH SUPPORT THIS GROUND. (State as best you can the time, place and manner and person involved.)

As I was exiting F. Dormitory, I was stopped by Officer Redd and Officer Broadnax, near the chowhall. Shortly thereafter the aforesaid officers engaged in a semi-private conversation. After deciding whether to escort me back to my dorm or to take me

GROUND TWO: * See additional Sheet *

SUPPORTING FACTS:

GROUND THREE:

SUPPORTING FACTS:

VI STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Sgt. Randolph, in liability - should be
ordered to pay plaintiff \$10,000 - in his personal
capacity; \$100,000 in representative capacity;
and a jury assessment; and pay any and
all future medical expenses

/s/ LaMarcus Howard 249423 /
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-12-2017
(Date)

/s/ LaMarcus Howard 249423 /
Signature of plaintiff(s)

LAMAR CW Jamaire Howard #249423
Bullock Correctional Facility
P.O. Box 5107
Union Springs, AL 36089



CLERK OF COURT
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
P O BOX 711
MONTGOMERY AL 36102-0711

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